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October 15, 2021

VIA ECF

Honorable Edward S. Kiel, U.S.M.J.  
United States District Court, District of New Jersey  
Martin Luther King, Jr. Federal Building and Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: GEA Mechanical Equipment US, Inc. v. Federal Insurance Company et al.  
Case No.: 2:20-cv-9741 (BRM) (ESK)

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Dear Judge Kiel:

This firm represents defendants Hartford Accident and Indemnity Company, Hartford Fire Insurance Company and First State Insurance Company (collectively, "Hartford") in the above-referenced matter. With respect to the telephonic status conference scheduled in this matter for Tuesday, October 19, 2021, the parties were to file a joint letter at least three days before the conference advising of the status of discovery and any other issues to be addressed per Your Honor's July 14, 2021 Text Order [ECF 35]. While the parties have been working on the joint letter, they have not yet been able to reach an agreement on the language. Accordingly, on behalf of Hartford, defendants The Continental Insurance Company and Wellfleet New York Insurance Company as successor to Atlanta International Insurance Company, we submit this request for leave to file the joint letter on Monday, October 18, 2021. Plaintiff GEA Mechanical Equipment US, Inc. does not consent to the adjournment.

We thank Your Honor for the time and courtesies extended in this matter.

Respectfully,

*/s/ Christopher K. Kim*

CHRISTOPHER K. KIM

cc: All counsel of record (via ECF)